

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

- against -

PLEXCORPS  
(a/k/a and d/b/a PLEXCOIN and SIDEPAY.CA),  
DOMINIC LACROIX, and  
SABRINA PARADIS-ROYER

Defendants,

17 Civ. 7007 (CBA-RML)

ECF Case

**AFFIDAVIT OF  
ROSE THOMAS**

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ROSE THOMAS declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an investor in Plexcoin. I have personal knowledge of the matters described in this affidavit.

2. I currently reside in Hempstead, New York. I am an accountant. I own a tax business called DR Tax Services, located at 49 North Main Street, Freeport, New York, 11520.

3. Before I invested in Plexcoin, I was interested in exploring investment opportunities in initial coin offerings (“ICOs”). The ICO market was appealing to me because of its low cost of investment opportunities and potential upside. I was (and am) well aware that any investments in any digital currencies could go up or down in value.

4. I had previously purchased Litecoin and Ethereum, but Plexcoin was the first ICO in which I invested.

5. I currently own 51,474.91046258 units of Plexcoin, which I originally purchased at a total dollar value of \$5,818.33. See Exhibit A, attached hereto, which contains screenshots from my Plexcoin account. Those investments were as follows:

<b>Date of Investment</b>	<b>Amount of Investment (US Dollar Equivalent)</b>	<b>Medium of Investment</b>
August 7, 2017	2,688.00	Ethereum
September 8, 2017	932.46	Litecoin
September 15, 2017	1,050.39	Ethereum
September 19, 2017	936.95	Litecoin
September 19, 2017	210.53	Ethereum

6. I did not use a credit card for any of my investments in Plexcoin.

7. In early August 2017, the first time that I logged into the plexcoin.com website and set up my account to invest in the Plexcoin ICO, I saw a screen that asked me to check a box to confirm that I am not a citizen or resident of the United States or Quebec or acting on behalf of such a citizen or resident. See Exhibit B, attached hereto. I had to check this box before I could proceed with completing my first transaction.

8. I checked this box because I wanted to take part in the ICO.

9. I was also prompted to check a box saying that I read the Terms of Service associated with the Plexcoin ICO. I'll admit that checked this box without actually reading the Terms of Service.

10. During my subsequent Plexcoin transactions, I did not see the screen with the checkbox asking me to represent that I am not a citizen or resident of the United States or Quebec. I assumed that this screen did not appear again because I already checked that box to

create my account, and, now that my account was set up, I did not have to provide the same information again.

11. As you can see from Exhibit C, a compilation of relevant screenshots from my Plexcoin account, my Plexcoin account now lists my logins, or connections, into my account.

12. This list of connections was not always available for me to see. In fact, the first connection it lists is November 4, 2017. I do not recall seeing this list before that date.

13. I have reviewed the list of my connections displayed in my account. I can easily identify most of the locations listed, although some are not immediately clear to me. For example, the majority of the logins were made from Hempstead, New York and Freeport, New York. That makes sense to me, as I reside in Hempstead and work in Freeport.

14. There are also several logins from Melbourne, Florida on November 26, 2017. Those listings make sense to me as well, because I traveled to Florida for the Thanksgiving holiday and logged into my Plexcoin account from there.

15. Two listings are not clear to me. One is the January 22, 2018 login from Brooklyn, New York. I assume this was an authorized login, because my account indicates that the login was successfully verified with my password. But I was not in Brooklyn on that date.

16. Additionally, there is a successful login from Boxborough, Massachusetts on March 16, 2018 at 13:15:50 GMT. At about that time, I was speaking by phone to Jason Gottlieb, counsel for the defendants in this action, and I provided my password to him and authorized him to log into my Plexcoin account, which he did, so that he could see my account webpage the way I see it. Mr. Gottlieb informed me that he was sitting in his office in midtown

Manhattan, New York, when he logged in, so I do not know why Boxborough, Massachusetts is listed as the location of that login.

17. Separately, I also opened another Plexcoin account, for my daughter. When I opened that account, I saw the same “checkbox” screen as the one attached as Exhibit B.

18. I have attached as **Exhibit D** a similar series of screenshots for that account, detailing my investments and my login record. Similar to the first Plexcoin account described above, I purchased Plexcoin with Litecoin. And also similar to the first account, the first “connection” the account lists is November 4, 2017, even though I did log in to that account before that date. I do not recall seeing this list before that date.

Dated: March 27, 2018

A handwritten signature in dark ink, appearing to read "Rose Thomas", written over a horizontal line.

Rose Thomas